

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LMAR LAY, individually and for other similarly situated,

Plaintiff,

V.

BETACOM HOLDINGS INC., Washington  
for profit corporation; BETACOM  
INCORPORATED, a Florida for profit  
corporation.

### Defendants.

Case No. 2:24-CV01195-RSM

**STIPULATION FOR EXTENSION OF  
TIME TO FILE MOTIONS FOR  
CONDITIONAL AND CLASS  
CERTIFICATION**

**NOTE ON MOTION CALENDAR:  
JANUARY 30, 2025**

Pursuant to Fed R. Civ. P. 6(b)(1)(A), Plaintiff LMar Lay and Defendants Betacom Holdings, Inc., and Betacom Incorporated stipulate to extend the time for Plaintiff to file his Motion for Conditional Certification and Motion for Class Certification. Under the extended schedule, Plaintiff's deadline to file his Motion for Conditional Certification will be extended to March 28, 2025. Plaintiff's deadline to file his Class Certification motion will be extended to May 16, 2025.

Counsel for Plaintiff and Defendants have conferred regarding this request. Good cause exists for this request because of the complex nature of the putative class action allegations in

1 Plaintiff's Complaint.

2 Plaintiff has not requested previous extensions from this Court. A proposed order is  
 3 submitted with this stipulation.

4 **IT IS THEREFORE STIPULATED AND AGREED**, by and between Plaintiff and  
 5 Defendants, by and through their counsel and subject to approval of this Court.

6 DATED this 30<sup>th</sup> day of January 2025.

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17 *\*Pro Hac Vice Applications Forthcoming*

18 *Attorneys for Plaintiff LMar Lay*

## ORDER

IT IS HEREBY ORDERED that the foregoing Stipulation for Extension of Time for Plaintiff to file his Motions for Conditional and Class Certification is GRANTED.

DATED this \_\_\_\_ day of January, 2025.

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Ricardo S. Martinez  
United States District Judge